

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHAWN CAREY, MSS CAPITAL, LLC,  
HUNTS ROAD, LLC, ION1 LLC,  
BRICKELL CAPITAL SOLO 401K TRUST,  
KAILEY LEWIS, EDWARD REINLE,  
EMANUEL VALADAKIS and ZITAH  
MCMILLAN-WARD, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL MOE, PETER B. RITZ, LZG  
INTERNATIONAL, INC., ROGER  
HAMILTON, and GENIUS GROUP  
LIMITED,

Defendants.

Case No. 1:24-cv-07551

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO APPOINT LEAD  
PLAINTIFF AND APPROVE AXS LAW, PLLC AS LEAD COUNSEL**

On the Motion of Plaintiffs, Shawn Carey, Hunts Road, LLC, Ion1 LLC, Brickell Capital Solo 401k Trust, Kailey Lewis, Edward Reinle, Emanuel Valadakis, and Zitah Mcmillan-Ward (together, the "Group"), and the Court having read all parties' papers, and considered all arguments of counsel, and good cause appearing, IT IS THIS \_\_\_\_\_ day of \_\_\_\_\_, 2024, ORDERED as follows:

1. The Group is hereby appointed as Lead Plaintiff. The Group satisfies the requirements for lead plaintiff pursuant to Section 21D(a)(3)(B)(iii) of the Private Securities Litigation Reform Act of 1995 ("PSLRA").

2. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, the Court approves the Group's selection of AXS Law Group, PLLC as lead counsel ("Lead Counsel").

3. Lead Counsel shall have the following responsibilities and duties, to be carried out personally or through counsel whom Lead Counsel shall designate:

- a. to coordinate the briefing and argument of motions;
- b. to coordinate the conduct of discovery proceedings;
- c. to coordinate the examination of witnesses in depositions;
- d. to coordinate the selection of counsel to act as a spokesperson at pretrial conferences;
- e. to call meetings of the plaintiffs' counsel as they deem necessary and appropriate from time to time;
- f. to coordinate all settlement negotiations with counsel for Defendants;
- g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter and to delegate work responsibilities to selected counsel as may be required; and
- h. to supervise any other matters concerning the prosecution, resolution, or settlement of this action.

4. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed without the approval of Lead Counsel.

5. No settlement negotiations shall be conducted without the approval of Lead Counsel.

6. Counsel in any related action that is consolidated with this Action shall be bound by this organization of Plaintiffs' counsel.

7. Lead Counsel shall have the responsibility of receiving and disseminating Court orders and notices.

8. Lead Counsel shall be the contact between plaintiffs' counsel and defendants' counsel, shall serve as the spokespersons for plaintiffs' counsel, and shall direct and coordinate the activities of plaintiffs' counsel.

9. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody, or

control, including computer-generated and stored information, and materials such as data and electronic mail, containing information which is relevant or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

---

HON. MARY KAY VYSKOCIL  
UNITED STATES DISTRICT JUDGE